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19 UNITED STATES OF AMERICA

20 UNITED STATES DISTRICT COURT  
21 FOR THE CENTRAL DISTRICT OF CALIFORNIA

22 WESTERN DIVISION

23 UNITED STATES OF AMERICA,

24 No. 2:23-cv-08091

25 Plaintiff,

26 V.  
27 VERIFIED COMPLAINT FOR  
28 FORFEITURE

29 \$41,802.00 IN U.S. CURRENCY,

30 21 U.S.C. § 881(a)(6)

31 Defendant.

32 [D.E.A.]

33 Plaintiff United States of America (“the government”) brings this claim against  
34 the defendant \$41,802.00 in U.S. currency, and alleges as follows:

## JURISDICTION AND VENUE

1. The government brings this *in rem* forfeiture action pursuant to 21 U.S.C. § 881(a)(6).

2. This Court has jurisdiction over the matter under 28 U.S.C. §§ 1345 and 1335.

3. Venue lies in this district pursuant to 28 U.S.C. § 1395.

## PERSONS AND ENTITIES

4. The plaintiff in this action is the United States of America.

9       5.     The defendant is \$41,802.00 in U.S. currency (the “defendant currency”)  
10 seized by law enforcement officers on or about March 31, 2023, from Huy Quoc Doan  
11 (“Doan”) at Los Angeles International Airport, located at One World Way, Los Angeles,  
12 California 90045.

13       6.     The defendant currency is in the custody of the United States Marshals  
14     Service in this District, where it will remain subject to this Court's jurisdiction during  
15     the pendency of this action.

16        7.      The interests of Doan and Shirley Banh may be adversely affected by these  
17 proceedings.

## BASIS FOR FORFEITURE

19        8.      On or about March 31, 2023, Drug Enforcement Administration (“DEA”)  
20 officers (“DEA Officers”) learned that Doan was transporting bulk U.S. currency from  
21 Pittsburgh International Airport to Los Angeles International Airport, having flown to  
22 Pittsburgh the day before, on or about March 30, 2023.

23        9.      DEA Officers saw Doan exit the arriving flight from Pittsburgh and  
24 followed him to the baggage claim area. When DEA Officers saw Doan pick up a metal  
25 suitcase, the DEA Officers identified themselves and spoke with Doan. After  
26 confirming his identity, Doan agreed to answer the DEA Officers' questions.

27       10. During their encounter with Doan, DEA Officers noticed that Doan's hands  
28 shook uncontrollably as he retrieved his wallet from his backpack, which caused DEA

1 Officers to believe Doan was likely a drug money courier.

2       11. When DEA Officers asked Doan to explain why he traveled to Pittsburgh  
3 and returned to Los Angeles in less than 24 hours, Doan stated that he traveled to  
4 Pittsburgh to meet a friend.

5       12. Doan carried three pieces of luggage: a metal suitcase, a fanny pack, and a  
6 backpack. DEA Officers found the defendant currency distributed among the three  
7 pieces of luggage.

8       13. Inside the metal suitcase, DEA Officers found loose bulk U.S. currency  
9 layered among towels, wrapped together in a pillowcase.

10       14. When asked, Doan told DEA Officers that he packed the metal suitcase  
11 himself, and that he had counted the currency and that the metal suitcase contained  
12 approximately \$30,000.00. Subsequently, Doan stated that he had in fact just assumed  
13 there was approximately \$30,000.00.

14       15. When asked to identify the owner of the bulk U.S. currency found in the  
15 metal suitcase, Doan told DEA Officers that the money did not belong to him, and that  
16 he did not know to whom it belonged. Doan refused to provide a contact phone number  
17 of the person who gave him the bulk U.S. currency in Pittsburgh, and stated that he did  
18 not know what he was supposed to do with the money now that he had returned to Los  
19 Angeles.

20       16. Doan told DEA Officers that a portion of the defendant currency belonged  
21 to him, estimating that \$7,000 found among the fanny pack and backpack he was  
22 carrying was from the sale of a dog. When asked by DEA Officers to explain the sale,  
23 Doan was unable to describe the dog or provide any photographs or text messages to  
24 confirm the alleged dog's existence.

25       17. When asked about the source of the defendant currency, Doan said that he  
26 was a student who used to work in a restaurant, and that he flew to Pittsburgh to collect  
27 money from "sales." However, Doan was unable to tell DEA Officers what he meant  
28 by "sales."

1       18. A Los Angeles Police Department Officer deployed his sophisticated  
2 trained narcotics-detecting canine, “Zuke,” to conduct a sniff test of the defendant  
3 currency. Zuke is trained to alert to the presence of heroin, cocaine (base and powder),  
4 and methamphetamine.

5       19. Zuke positively alerted to the defendant currency, demonstrating that the  
6 defendant currency was recently in contact with controlled substances.

7       20. Shirley Banh filed a claim to the defendant currency in the administrative  
8 forfeiture proceedings that preceded the filing of this Complaint.

9       21. The defendant currency bears indicia of drug trafficking, including but not  
10 limited to the following, showing the funds are traceable proceeds of drug trafficking or  
11 were intended to be used in one or more exchanges for a controlled substance:

12           a. Doan purchased his airline ticket two days before his flight to  
13 Pittsburgh, and returned to Los Angeles within 24 hours. Drug money couriers often  
14 purchase tickets shortly before their travel in the belief that a short duration between  
15 purchase and travel minimizes their exposure to law enforcement examination.

16           b. Doan distributed the defendant currency across three pieces of  
17 luggage. Drug money couriers frequently divide the money they are carrying among  
18 several locations in luggage in the belief that distribution makes it more difficult for law  
19 enforcement to discover.

20           c. Doan did not know how much money he was transporting, and stated  
21 that he just assumed that the metal suitcase contained \$30,000.00. Drug money couriers  
22 frequently do not know how much money they are carrying because their controllers do  
23 not tell them the total amount that they are given to transport.

24           d. Doan carried rubber-banded bundles of mixed denominations of U.S.  
25 currency in his fanny pack and backpack, which is a common method for drug money  
26 couriers to secure bundles of drug money.

27           e. Doan appeared visibly nervous when questioned by officers. Drug  
28 money couriers often become nervous when approached by law enforcement officers.

1                   f.     Doan was unable to identify who gave him the defendant currency in  
2 Pittsburgh. Drug money couriers commonly are not given the identity of other drug  
3 money couriers involved in the transportation of drug money.

4                   g.     A sophisticated trained narcotics-detecting canine alerted to the  
5 defendant currency, indicating that it had recently been in contact with narcotics.

6                   h.     Doan possessed a receipt dated March 14, 2023, for the purchase of  
7 one hundred and five cans of “window and door” sealant foam, costing over \$500.00.  
8 Drug traffickers commonly use bulk amounts of sealant foam to package narcotics and  
9 create air-tight seals intended to evade detection by law enforcement officers.

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## CLAIM FOR RELIEF

22. Based on the above, plaintiff alleges that the defendant currency represents or is traceable to proceeds of illegal narcotic trafficking or was intended to be used in one or more exchanges for a controlled substance or listed chemical, in violation of 21 U.S.C. § 841 *et seq.* The defendant currency is therefore subject to forfeiture pursuant to 21 U.S.C. § 881(a)(6).

WHEREFORE, plaintiff United States of America prays:

- (a) that due process issue to enforce the forfeiture of the defendant currency;
- (b) that due notice be given to all interested parties to appear and show cause why forfeiture should not be decreed;
- (c) that this Court decree forfeiture of the defendant currency to the United States of America for disposition according to law; and
- (d) for such other and further relief as this Court may deem just and proper, together with the costs and disbursements of this action.

Dated: September 27, 2023

E. MARTIN ESTRADA  
United States Attorney  
MACK E. JENKINS  
Assistant United States Attorney  
Chief, Criminal Division  
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Chief, Asset Forfeiture and Recovery Section

/s/ James E. Dochterman  
JAMES E. DOCHTERMAN  
Assistant United States Attorney

Attorneys for Plaintiff  
United States of America

## VERIFICATION

I, Marlon Coronado, hereby declare that:

1. I am a Task Force Office of the Drug Enforcement Administration and am familiar with this investigation.

2. I have read the above Verified Complaint for Forfeiture and know its contents. It is based upon my own personal knowledge and reports provided to me by other law enforcement agents, which I believe to be reliable.

3. Everything contained in the Complaint is true and correct, to the best of my knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed 9-26-2023 in Los Angeles, California.

MARLON CORONADO  
Task Force Officer  
Drug Enforcement Administration